

CHAITMAN LLP
465 PARK AVENUE
NEW YORK, NY 10022
(888) 759-1114
TELEPHONE & FAX

HELEN DAVIS CHAITMAN
hchaitman@chaitmanllp.com

March 4, 2022

VIA ECF

Hon. Colleen McMahon U.S.D.J.
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St
New York, NY 10007-1312

Re: *Picard v. Jacob M. Dick Rev Living Trust, et al.*
Adv. Pro. No.: 10-04570 (CGM)

Dear Judge McMahon:

This firm represents the Defendants. Pursuant to Your Honor's Individual Rules, we submit this letter motion for an order adjourning the Trustee's pending summary judgment motion filed on February 28, 2022, ECF #102 (the "Motion"). The Trustee made the Motion returnable March 16, 2022. Defendants' opposition to the Motion is due next Wednesday, March 9, 2022. I am currently on trial in another matter, which began yesterday and should last through next week. Accordingly, we respectfully request the following adjustment to the briefing schedule and adjournment of the Motion:

- Defendants' opposition due March 18, 2022
- Trustee's reply due March 25, 2022
- Motion returnable March 30, 2022 (or such other date as convenient for the Court)

Per Individual Rules, I.D.2.:

- Defendants' original deadline to oppose the motion is March 9, 2022;
- Defendants have not made any previous requests for extension;

CHAITMAN LLP

Hon. Colleen McMahon U.S.D.J.

March 4, 2022

Page 2

- The Trustee has not responded to our request for consent; and
- The adjournment would not affect any other scheduled dates.

We thank the Court for your consideration.

Respectfully submitted,

/s/ Helen Davis Chaitman

Helen Davis Chaitman

HDC:leb

cc: All counsel via ECF